



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

271 Cadman Plaza East

Brooklyn, New York 11201

JDL
F.#2011R00343

January 13, 2012

By ECF and Hand

The Honorable Dora L. Irizarry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Pauline Wiltshire
Criminal Docket No. 11-164 (DLI)

Dear Judge Irizarry:

The government respectfully submits this letter to request an extension from January 17, 2012 to January 31, 2012 of the deadline to file its response to the defendant's objection to the Presentence Investigation Report ("PSR") in the above-captioned case. Defense counsel consents to this request. The parties also jointly request that sentencing be adjourned from February 10, 2012 to the afternoon of April 6, 2012. The defendant is currently at liberty on bond.

On December 19, 2011, the Probation Department issued the PSR. On January 3, 2012, both parties served objections on the Probation Department. The defendant made substantial objections to the drug quantity attributed to the defendant in the PSR, which may eventually necessitate the scheduling of a hearing pursuant to United States v. Fatico, 579 F.2d 707 (2d Cir. 1978). The government is endeavoring to respond to the defendant's objections, but requests a two-week extension to January 31, 2012, because the undersigned Assistant United States Attorney will be traveling overseas next week.

If the requested extension is granted, the parties jointly request that sentencing be adjourned to the afternoon of April 6, 2012. The undersigned Assistant United States Attorney is scheduled to begin a trial before the Honorable Kiyo A. Matsumoto on February 21, 2012. In addition, travel commitments of both counsel render April 6, 2012 the first potential sentencing date for which both counsel can comply with the

Court's Standard Requirements in Criminal Cases prior to sentencing.

For these reasons, the government requests, with the consent of defense counsel, an extension from January 17, 2012 to January 31, 2012 of the deadline to file its response to the defendant's objection to the PSR, and the parties jointly request that sentencing be adjourned from February 10, 2012 to the afternoon of April 6, 2012.

Respectfully submitted,

LORETTA E. LYNCH
UNITED STATES ATTORNEY

By: /s/ Justin D. Lerer
Justin D. Lerer
Assistant U.S. Attorney
(718) 254-6124

cc: Paul S. Kish, Esq. (by ECF)
United States Probation Officer Jennifer Fisher (by e-mail)